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Attorneys for Intervenor, Martin F. Triano

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

YUGEN KAISHA, Y.K.F.,  
  
Plaintiff,  
  
v.  
  
STEPHANIE DODSON,  
  
Defendant.

Case No.: C-08-225-SC

**PROPOSED JOINT DISCOVERY PLAN**

Case Management Conference

Date: September 5, 2008  
Time: 10:00 a.m.  
Place: Courtroom 1  
Judge: Hon. Samuel Conti

Plaintiff and Counterdefendant, Yugen Kaisha, Y.K.F., Defendant and Counterclaimant, Stephanie Dodson, and Intervenor, Martin F. Triano dba Law Offices of Martin F. Triano, by and through their respective counsel, hereby agree to the following discovery plan.

1. Changes to the Timing Form or Requirement For Initial Disclosures: The parties have agreed to exchange initial disclosures on or before September 15, 2008.

2. Timing, Subject Matter and Limitations of Discovery Subsequent to Initial Disclosures: Any discovery permitted pursuant to the Federal Rules of Civil Procedure shall be permissible after the initial disclosures are made.

3. Proposed Deadlines for Discovery and Other Matters: A scheduling order is requested as follows: (a) all discovery to be completed on or before March 16, 2009 (meaning that all responses to written discovery requests are due on or before this date and all deposition testimony must be completed on or before this date), except for discovery with respect to expert witnesses; (b) expert witnesses shall be disclosed on or before March 2, 2009; (c) all potentially dispositive motions shall be filed by April 17, 2009; (d) a trial setting conference shall be set for shortly after the expiration of the discovery period, which shall deal with the discovery period for expert witnesses and the briefing and trial schedule; and (e) the case should be ready for trial by July 2009.

Dated: August 28, 2008

MONROE LAW GROUP

By: /s/ James S. Monroe  
James S. Monroe  
Attorneys for Yugen Kaisha, Y.K.F.

Dated: August 28, 2008

LAW OFFICE OF JOEL K. BELWAY

By: /s/ Joel K. Belway  
Joel K. Belway  
Attorney for Stephanie Dodson

Dated: August 28, 2008

LAW OFFICES OF TRIANO & BYRNE

By: /s/ Mark D. Byrne  
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